

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esq.
1 Eves Drive, Suite 111
Marlton, NJ 08053
Attorney for Debtors
RM-1141

In Re:

Travis D. Kirsch

Case No. 19-25587ABA

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtors in the above-captioned chapter 13 proceeding hereby object to the following
(choose one):

1. X Motion for Relief from the Automatic Stay filed by Quicken Loans LLC, creditor. A hearing has been scheduled for 3/9/2021, at 10:00 a.m.

OR

____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

____ Certification of Default filed by _____, creditor. We are requesting that a hearing be scheduled on this matter.

OR

X Certification of Default filed by Standing Chapter 13 Trustee. We are requesting that a hearing be scheduled on this matter.

2. We are objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

 X Other: I propose to cure the arrears by making an immediate \$2,500.00 payment, with the balance paid over a six month period, by making equal monthly payments. Additionally, my regular monthly mortgage payments will be paid. I respectfully request that the court deny the creditor's motion.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. We certify under penalty of perjury that the foregoing is true and correct.

Date: 2/23/2020

/s/ Travis D. Kirsch
Travis D. Kirsch, debtor